

***Dancer et al., v. USA, et al.***

**Works Cited**

1. “A Brief and Incomplete History of Environmental Racism in Kalamazoo.” *A Brief and Incomplete History of Environmental Racism in Kalamazoo – Jesusmeetskant*, 8 Oct. 2020, [jesusmeetskant.wordpress.com/2020/10/08/a-brief-and-incomplete-history-of-environmental-racism-in-kalamazoo/](https://jesusmeetskant.wordpress.com/2020/10/08/a-brief-and-incomplete-history-of-environmental-racism-in-kalamazoo/).
2. “Allen Chapel A.M.E. Church — Kalamazoo Public Library.” *Kalamazoo Public Library*, 29 May 2023, [www.kpl.gov/local-history/kalamazoo-history/black-history/allen-chapel-a-m-e-church/](http://www.kpl.gov/local-history/kalamazoo-history/black-history/allen-chapel-a-m-e-church/).
3. Andrews, Chris. “Michigan Gets F Grade in 2012 State Integrity Investigation.” *Center for Public Integrity*, 19 Mar. 2012, [publicintegrity.org/politics/state-politics/michigan-gets-f-grade-in-2012-state-integrity-investigation/](http://publicintegrity.org/politics/state-politics/michigan-gets-f-grade-in-2012-state-integrity-investigation/).
4. “Asthma Is Killing Kalamazoo Family Living Near a Stinking Factory. Now the State Is Studying Asthma in the Neighborhood.” *Mlive*, 16 Aug. 2021, [www.mlive.com/news/kalamazoo/2021/08/asthma-is-killing-kalamazoo-family-living-near-a-stinking-plant-now-the-state-is-studying-asthma-in-the-neighborhood.html](http://www.mlive.com/news/kalamazoo/2021/08/asthma-is-killing-kalamazoo-family-living-near-a-stinking-plant-now-the-state-is-studying-asthma-in-the-neighborhood.html).
5. “Black Infants 5 Times More Likely Than Whites to Die in Kalamazoo, and Disparity Is Growing.” *Mlive*, 12 Sept. 2013, [www.mlive.com/news/kalamazoo/2013/09/infant\\_mortality\\_in\\_kalamazoo.html](http://www.mlive.com/news/kalamazoo/2013/09/infant_mortality_in_kalamazoo.html).
6. “Drone Sniffs Out Toxic Chemicals Above Kalamazoo Wastewater Treatment Plant.” *Mlive*, 7 Sept. 2022, [www.mlive.com/news/kalamazoo/2022/09/drone-sniffs-out-toxic-air-above-kalamazoo-wastewater-treatment-plant.html](http://www.mlive.com/news/kalamazoo/2022/09/drone-sniffs-out-toxic-air-above-kalamazoo-wastewater-treatment-plant.html).
7. “Graphic Packaging International to Permanently Close White Pigeon Mill.” *Mlive*, 12 May 2020, [www.mlive.com/news/kalamazoo/2020/05/graphic-packaging-international-to-permanently-close-white-pigeon-mill.html](http://www.mlive.com/news/kalamazoo/2020/05/graphic-packaging-international-to-permanently-close-white-pigeon-mill.html).
8. “How Do the Different Parts of Particulate Matter (PM) Fit Together? | US EPA.” *US EPA*, 16 Sept. 2019, [www.epa.gov/air-emissions-inventories/how-do-different-parts-particulate-matter-pm-fit-together](http://www.epa.gov/air-emissions-inventories/how-do-different-parts-particulate-matter-pm-fit-together).
9. “Kalamazoo Public Safety Officers Target Black Drivers in Traffic Stops, Racial Profiling Study Concludes.” *Mlive*, 4 Sept. 2013, [www.mlive.com/news/kalamazoo/2013/09/kalamazoo\\_public\\_safety\\_office\\_19.html](http://www.mlive.com/news/kalamazoo/2013/09/kalamazoo_public_safety_office_19.html).
10. Krafcik, Michael. “Kalamazoo Files Legal Action to Condemn Home Connected to Mobile Nuisance Parties.” *WWMT*, 7 June 2023, [wwmt.com/news/local/kalamazoo-local-news-x-train-crime-mobile-nuisance-parties-northside-arrests](http://wwmt.com/news/local/kalamazoo-local-news-x-train-crime-mobile-nuisance-parties-northside-arrests).
11. “Medical Apartheid.” *C-SPAN.org*, 11 June 2007, [//www.c-span.org/video/?196754-1/medical-apartheid](http://www.c-span.org/video/?196754-1/medical-apartheid).
12. “Michigan Gets F Grade in 2015 State Integrity Investigation.” *Center for Public Integrity*, 9 Nov. 2015, [publicintegrity.org/politics/state-politics/state-integrity-investigation/michigan-gets-f-grade-in-2015-state-integrity-investigation/](http://publicintegrity.org/politics/state-politics/state-integrity-investigation/michigan-gets-f-grade-in-2015-state-integrity-investigation/).
13. Perkins, Tom. “US Attorney: Michigan Is the Nation’s Most Corrupt State.” *Detroit Metro Times*,

- [www.metrotimes.com/news/us-attorney-michigan-is-the-nations-most-corrupt-state-21817066](http://www.metrotimes.com/news/us-attorney-michigan-is-the-nations-most-corrupt-state-21817066).
14. “Philadelphia Apologizes for Decades of Medical Experiments on Black Inmates That Involved a Component of Agent Orange.” *NBC News*,  
[www.nbcnews.com/news/nbcblk/philadelphia-apologizes-decades-medical-experiments-black-inmates-invo-rcna51187](http://www.nbcnews.com/news/nbcblk/philadelphia-apologizes-decades-medical-experiments-black-inmates-invo-rcna51187).
  15. “Report Suggests CIA Involvement in Fla. Illnesses.” *Washington Post*,  
[www.washingtonpost.com/archive/politics/1979/12/17/report-suggests-cia-involvement-in-fla-illnesses/5b10205e-170b-4e38-b64e-2e9bca8f50df](http://www.washingtonpost.com/archive/politics/1979/12/17/report-suggests-cia-involvement-in-fla-illnesses/5b10205e-170b-4e38-b64e-2e9bca8f50df).
  16. Ronimous, Jason. “Indiana Branch of Fortune 500 Company Closing, Laying off Entire Workforce.” *WISH-TV | Indianapolis News | Indiana Weather | Indiana Traffic*, 30 May 2023,  
[www.wishtv.com/news/business/indiana-branch-of-fortune-500-company-closing](http://www.wishtv.com/news/business/indiana-branch-of-fortune-500-company-closing).
  17. “Stay Indoors to Avoid Polluted Air Hazard, State Says. That’s No Solution, Neighbors Say.” *Mlive*, 10 May 2023,  
[www.mlive.com/news/kalamazoo/2023/05/stay-indoors-to-avoid-polluted-air-hazard-state-says-thats-no-solution-neighbors-say.html](http://www.mlive.com/news/kalamazoo/2023/05/stay-indoors-to-avoid-polluted-air-hazard-state-says-thats-no-solution-neighbors-say.html).
  18. Thompson, Chad. “Iowa Paper Mill to Close After Over 100 Years in Business.” *KCCI*, 4 May 2023,  
[www.kcci.com/article/tama-paper-mill-to-close-in-iowa/43784535](http://www.kcci.com/article/tama-paper-mill-to-close-in-iowa/43784535).

**THE J.R. BEASON FIRM PLLC.**

\S\ John R. Beason III, Esq.

John R. Beason III,  
Attorney for the Plaintiffs  
D.C. Bar No.: 1721583  
IBA Bar No.: 1522438  
853 McAlister St.  
Benton Harbor, MI 49022

June 7th, 2023.

[JRBeason3@TheJRBeasonFirm.com](mailto:JRBeason3@TheJRBeasonFirm.com)